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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JULIA HAYER,

Plaintiff,

vs.

ALEX LIVERANT, and DOES 1 through 20,
inclusive;

Defendant.

Case No.: 3:22-cv-5420-VC

**JOINT STIPULATION FOR ENTRY OF
DISMISSAL WITH PREJUDICE AND
CONSENT TO FULL MAGISTRATE
JUDGE JURISDICTION TO RETAIN
JURISDICTION TO ENFORCE
SETTLEMENT AGREEMENT AND
[PROPOSED] ORDER**

Judge: Hon. Vince Chhabria

Action Filed: 9/22/2022

Trial Date: 4/29/2024

Plaintiff Julia Hayer filed this action alleging that Defendant Alex Liverant violated the Fair Housing Act and related state laws, operated his properties negligently, and intentionally inflicted emotional distress. Defendant Alex Liverant denies each of these allegations.

After vigorously litigating the lawsuit, the parties have engaged in a good faith, arm's length negotiation and executed a Settlement Agreement, have reached an agreement, and stipulate to resolution of all the claims in the above-captioned action.

Now, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Julia Hayer and Defendant Alex Liverant, the parties, jointly and respectfully request that the District Court so-order the agreement, dismiss the claims in this action, and transfer the case to Chief Magistrate Judge Donna M. Ryu to retain jurisdiction for three years to enforce the terms of the Settlement Agreement, which is to be lodged with the Court.

DISABILITY RIGHTS CALIFORNIA

DATED: 4/12/2024

/s/
 Autumn M. Elliott
 Navneet K. Grewal
 Aisha C. Novasky
 Attorneys for Plaintiff

LAW OFFICE OF DENNIS C. HYDE

DATED: 4/12/2024

/s/
 Dennis C. Hyde
 Attorney for Defendant

VII & IX, A PROFESSIONAL LAW CORP.

DATED: 4/12/2024

/s/
 Heather Borlase
 Attorney for Defendant

BAYER LAW & MEDIATION

DATED: 4/12/2024

/s/
 Alan Bayer
 Attorney for Defendant

L. R. 5-1(H)(3) ATTESTATION

I, the filer of this document, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

[PROPOSED] ORDER

The parties executed a Settlement Agreement on April 11, 2024. The Settlement Agreement resolves all the claims presented in the complaint. The settlement includes payments for damages, attorneys' fees and costs, and requires training for Defendant on the laws for disability and accommodations in housing, and the adoption of a policy by Defendant pertaining to reasonable accommodations. The Settlement Agreement also grants Plaintiff's reasonable accommodation request to keep an assistance animal.

The parties having stipulated and good cause appearing, IT IS HEREBY ORDERED that this action is DISMISSED, and the Court transfers the case to Chief Magistrate Judge Donna M. Ryu to retain jurisdiction for three years to enforce the Settlement Agreement signed by the parties on April 11, 2024 and lodged with the Court. At the conclusion of the three-year period, the actions will be deemed dismissed with PREJUDICE.

IT IS SO ORDERED.

DATED: _____, 2024

HON. VINCE CHHABRIA
United States District Court